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Sent: Friday, November 08, 2013 8:54 AM
To: Guivetchi, Kamyar@DWR; Massera, Paul@DWR; Beutler, Lisa@COMCAST
Subject: CWC Staff Comments on RMS Chapters

Hello,

The Water Commission staff has gone through the Resource Management Strategies in the Water Plan Update and discussed them. We have developed some overarching themes we thought appropriate for comments from the Commission, as well as some more specific comments. We would appreciate your thoughts on them during the meeting this morning.

Attached are a list of our overarching comments and a table describing more specific comments.

Thank you,

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Overarching Comments for the Water Plan Update 2013 Resource Management Strategies

1. Several of the Resource Management Strategies (Groundwater and Conjunctive Management, Water Transfers, System Reoperation) highlight the importance of **water storage and water conveyance**, and the relationship between reliable surface water supplies and the successful implementation of these Strategies. Yet only one of the chapters has any recommendations related to storage or conveyance.

Commission comments would underscore the importance to look at all of these components/types of projects for successful and sustainable water management.

2. Many of the chapters recommend funding for a specific type of project or resource management strategy. While funding all of these strategies is important, they cannot be funded in a piecemeal fashion. The state must strategically invest in the most critical projects that provide maximum benefits in order to make the most of limited funding. Funding for any of these specific strategies must be evaluated within the context of a broader **statewide funding plan or strategy**.

3. We appreciate that **climate change** was addressed in every Resource Management Strategy. The State can only adapt to and mitigate climate change by addressing it on every possible front. The Water Plan Update 2013 recognizes this and provides a comprehensive look at ways the water community can address climate change. Perhaps a table that summarizes the role of each resource management strategy in addressing Climate Change could be included as an appendix.

4. The theme of improved **agency alignment** at all levels is reinforced throughout various Resource Management Strategies. The Commission agrees that agency alignment is critical to the effective management of California's water. This theme aligns closely with the Commission's strategic plan Goal 3C to improve coordination between federal, state, tribal and local public agencies and stakeholders.

The example of the Water Plan process is a good model for collaboration and needs to be continued (and relates to upcoming funding issues for Water Plan process)

5. Throughout the Resource Management Strategies, the need for **improved data collection, sharing of data, data consistency, and technical assistance** for local agencies also emerges as a common theme. The Commission supports efforts by the State to improve the integrity, consistency and accessibility of data that enables better water management.

6. The State's role in providing **outreach and education** to water agencies, water managers, and water users, and disseminating critical water management information is an important one. The Commission supports the many outreach and education recommendations throughout the Resource Management Strategies.

7. The Commission strongly supports **Integrated Water Management** and appreciates that it is highlighted so strongly throughout the Resource Management Strategies. The recommendations promoting IWM are consistent with the Commission's strategic goal 3D to develop and support policies that advance integrated resource management.

Section	Topic	Comments	Link(s) to Strategic Plan
Chapter 2 (Ag Water), Recommendation 1	The State should clarify policy and improve incentives, assurances, and water rights protections to allay fears over the loss of water rights resulting from improved water use efficiency.	Focus on the ‘water rights’ issue of this recommendation – ensure that future system improvements and new water management strategies respect existing water rights	Goal 3A
Chapter 3 (Urban Water), Recommendation 1	“Assist Utilities in Developing Sustainable Conservation Rate Structures” DRW and other agencies should evaluate the effectiveness of rate structures in conservation.	The Commission was made aware of the challenges water agencies face when implementing conservation pricing at several meetings and received a briefing on potential rate structure, Consumption-Based Fixed Revenue, at its May 2013 meeting. Supports this recommendation.	Goal 3
Chapter 3 (Urban Water), Box 3-13	Climate Change and Water Use Efficiency: The Energy-Water Nexus	Discussed at 10/16/13 meeting during Agenda Item 9, discussion of AB 32 update. Recognition of the Water - Energy Nexus will become more important we adapt and mitigate to climate change. The Commission appreciates that the Water Plan took the time to highlight this important issue.	Goal 3E
Chapter 5 (Delta Conveyance), Body	Mainly BDCP.	General comments regarding the importance of the Delta ecosystem and its protection and management. System reop, water transfers, and conjunctive management chapters all also mention conveyance.	Goals 3B and 3E
Chapter 7 (System Reoperation), Body	Quantifying benefits is mentioned in the “Next Steps” section. Phase 3 Preliminary Assessment Strategies, Phase 4 Reconnaissance Level Assessment Strategies.	The Commission’s document Description and Screening of Potential Tools and Methods to Quantify the Public Benefits of Water Storage Projects provides guidance on economic methods for quantifying the public benefits of System Reoperation Projects. The CWP may wish to reference that document in this section.	Goal 3B
Chapter 8 (Water Transfers), Recommendation 3D	Streamlining the approval process of State and federal agencies for water transfers where approvals are required, while protecting water rights, the environment, and local economic interests.	At the Commission’s joint meeting with the California Food and Agriculture Board, this issue was addressed. The Commission supports efforts to streamline the water transfer approval process while ensuring appropriate protections.	Goal 3A
Chapter 8 (Water Transfers), Recommendation 3E	Refining current methods to identify and quantify water savings for transfers using crop idling, crop shifting, and water use efficiency measures; and assessing the impacts of riceland idling on environmental resources, while using a collaborative process to evaluate a wide range of methods.	The impacts of these measures are complex, and the Commission agrees that a better understanding of these impacts is important.	Goals 3B and 3D

Chapter 9 (Conjunctive Management), Body	Page 9-9, Data collection and Management-Bulletin 118. The Water Plan used the development of this RMS to fill the need for an updated Bulletin 118. Bulletin 118 has not been updates since 2003 due to funding constraints.	The Commission commends DWR on this collaborative way of getting people the information they need to better manage groundwater in light of Bulletin 118 funding issues.	Goal 3C
Chapter 9 (Conjunctive Management), Body	Page 9-19, Surface Water and Groundwater Management; “New and changing understanding of water quality constituents, result in changing water quality standards...leads to uncertainty in planning and implementing conjunctive management projects.”	Similar to Adan’s comment at October meeting.	
Chapter 9 (Conjunctive Management), Recommendation 10F	Projects will request bond funding from CWC by 2016.	Recommendation mentions CWC-may want to comment.	
Chapter 12 (Municipal Recycled Water), Recommendation 2	DWR, in cooperation with the SWRCB and the RWQCBs, will identify obstacles to increasing agricultural and environmental reuse of recycled water.	Commission sees great promise in water recycling, but success depends on identifying and addressing barriers, including perception issues, regulatory, etc	Goals 3C and 3D
Chapter 12 (Municipal Recycled Water), Recommendation 6	Incorporate wastewater agencies into regional IRWM processes, which will facilitate the integration of recycled water into the water supply planning process.	Idea of including wastewater agencies in discussion is consistent with agency collaboration and alignment	Goal 3D
Chapter 13 (Surface Storage – CALFED), Recommendation 1	CALFED signatories and stakeholders should continue to prioritize work efforts to complete the feasibility and environmental studies of the surface storage investigations.	Tie the Commission’s response to the work it is doing to look at surface storage holistically and especially the public benefits of such projects.	Goal 3B
Chapter 15 (Drinking Water), Body	Pages 15-8 and 15-9, Potential Costs	Comment on the relationship between increasing treatment standards, increasing costs, and increased energy use	Goal 3E
Chapter 15 (Drinking Water), Body	Page 15-16, Disadvantaged Communities/Environmental Justice; This section gives a basic description of EJ issues/activities	The Commission should recommend a stronger statement about the importance of EJ and access to safe drinking water.	
Chapter 15 (Drinking Water), Recommendation 9	State government should consider providing incentives that would encourage water systems to adopt rate structures that encourage conservation.	Agree. Water rate structures are an effective way to increase conservation, but implementing these structures can cause difficulties for local agencies. The state should help where appropriate.	Goal 3D
Chapter 22 (Ecosystem Restoration), Recommendation 2	Promote multidisciplinary approaches to water and flood management. Devise a system of payments for ecosystem services.	Ecosystem services are typically not valued in a traditional sense. A system of payments for ecosystem services may be an effective way to ensure that they are appropriately valued in water management.	Goal 3B
Chapter 23 (Forest Management), Body	Pages 23-5 to 23-7, meadows should be restored and managed to increase groundwater recharge	Agree, increased groundwater recharge increases water supply reliability and water quality	
Chapter 31 (Water Dependent	California’s public agencies should endeavor to better protect and enhance public access to waterways, lakes, and beaches	Increase opportunities for all Californians including disadvantaged communities.	

Recreation), Recommendation 1	within their jurisdiction.		
Chapter 31, Recommendation 48	Create multi-benefit flood control or de-channelization to provide urban open space along rivers or canals for recreation.	The Commission agrees that multi-benefit projects are an effective investment in California's water future.	